

LAW OFFICE OF TODD D. LERAS
Todd D. Leras, CA SBN 145666
455 Capitol Mall, Suite 802
Sacramento, CA 95814
Telephone: (916) 504-3933

Attorney for Defendant
MYRA MINKS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MYRA BOLECHE MINKS,

Defendant.

CASE NO. 2:22-cr-00137 JAM

**STIPULATION AND ORDER CONTINUING
STATUS CONFERENCE AND EXCLUDING
TIME UNDER THE SPEEDY TRIAL ACT**

Date: April 23, 2024
Time: 9:00 a.m.
Court: Hon. John A. Mendez

This matter is set for a status conference on April 23, 2024. By this stipulation, Defendant Myra Minks moves to continue the status conference to June 18, 2024. The parties stipulate as follows:

1. The case involves charges of, among other potential crimes, Mail Fraud, False Personation of an Officer or Employee of the United States, and Aggravated Identity Theft. The Indictment expressly alleges that investigation of the matter revealed potential criminal conduct in California, Georgia, Illinois, Michigan, Nevada, and Texas. Defense investigation of the matter therefore necessarily extends to numerous other states.

- 1 2. The government has produced discovery materials in the case nearing 4,000 pages of
2 reports and supporting materials, along with video and audio recordings of relevant
3 events. All the discovery materials are subject to a protective order. The Court
4 approved appointment and substitution of defense counsel to represent Ms. Minks in
5 this matter in the place of her previous counsel on November 14, 2023.
- 6 3. Ms. Minks is being held in pre-trial detention at the Sacramento County Main Jail.
7 Substitute counsel is continuing discovery review with Ms. Minks, utilizing the
8 assistance of a defense investigator to ensure compliance with the existing protective
9 order. In addition, the defense is conducting its own investigation of matters relevant
10 to the pending charges.
- 11 4. Defense counsel requests additional time, given his relatively recent appointment, to
12 continue with discovery review and defense investigation. The government does not
13 object to the continuance.
- 14 5. Counsel for Defendant Minks believes that failure to grant the requested continuance
15 would deny him the reasonable time necessary for effective preparation, considering
16 the exercise of due diligence.
- 17 6. Based on the above-stated facts, Defendant Minks requests that the Court find that the
18 ends of justice served by continuing the case as requested outweigh the best interest
19 of the public and the Defendant in a trial within the time prescribed by the Speedy
20 Trial Act.
- 21 7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et*
22 *seq.*, within which trial must commence, the time period of April 23, 2024, up to and
23 including June 18, 2024, is deemed excludable under 18 U.S.C. § 3161(h)(7)(A) and
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(B)(iv) [Local Code T-4].

8. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period during which trial must commence.

Assistant U.S. Attorney Justin Lee has reviewed this stipulation and authorized Attorney Todd D. Leras via email to sign it on his behalf.

Dated: April 17, 2024

/s/ Todd Leras

TODD LERAS
Attorney for defendant
MYRA MINKS

Dated: April 17, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Justin Lee

By:

JUSTIN LEE
Assistant United States Attorney
(Per email authorization)

ORDER

BASED ON THE REPRESENTATIONS AND STIPULATIONS OF THE PARTIES, it is hereby ORDERED that the status conference scheduled for April 23, 2024, is **VACATED** and **RESET** for **June 18, 2024, at 9:00 a.m.**

The Court further finds, based on the representations of the parties, that the ends of justice served by continuing the case as requested outweigh the best interests of the public and the Defendants in a speedy trial.

Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161 (h)(7)(A) and (B)(iv), Local Code T-4, to allow necessary attorney preparation, taking into consideration the exercise of due diligence, for the period from April 23, 2024, up to and including June 18, 2024.

IT IS SO ORDERED.

Dated: April 18, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE